

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

vs.

MICHAEL C. WOODS and GAETAN
DINELLE,

Defendants.

**VOIR DIRE REQUESTS FROM
DEFENDANT MICHAEL C. WOODS**

Criminal Action No. 5:08-CR-676-NAM

Defendant Michael C. Woods, by and through his attorneys, Hinman, Howard & Kattell, LLP, hereby requests that the Court make the following inquiries of prospective jurors:

GENERAL JURY BACKGROUND

1. Where do you live? Describe your neighborhood.
2. Are you married, single?
3. Describe your family.
4. Where are you employed?
5. What are your employment duties and responsibilities?
6. Will attendance at a trial that will last a week or more cause you any hardship?
How about if there is a break at some point in the trial and we have to pick it up again at a later date?
7. Describe your family members.
8. Where are they employed, if applicable?
9. Are any of your family members or friends employed in law enforcement? If so, describe their position and responsibilities. Do you ever talk to them about their work? Are you more likely to believe the testimony of a law enforcement officer as a result?

EXPERIENCE WITH JUDICIAL SYSTEM

10. Have you, a family member, or a friend ever been a party to a lawsuit? If so, describe the nature of the lawsuit and the result.

11. Have you, a family member, or a friend ever been a defendant in a criminal prosecution? If so, describe the nature of the prosecution and the result.

12. Have you, a family member, or a friend ever been a victim of a crime? If so, describe. Did a criminal prosecution result? Were you required to testify?

13. Have you ever been a juror? If so, describe the nature of the judicial proceeding and the result.

ATTITUDES TOWARD THE PARTIES AND THE NATURE OF THE CASE

14. What is your attitude toward the Government? Are you more likely to believe the prosecution's case because it is brought in the name of the United States Government?

15. Do you believe that Government or law enforcement witnesses are more likely to tell the truth than other witnesses? Less likely?

16. The defendants are alleged to have engaged in the distribution of marijuana. Do you believe you can keep an open mind before reaching any conclusions?

17. Do you understand that the defendants are presumed innocent, and that the Government has the burden to prove the guilt of each defendant beyond a reasonable doubt? Are you willing to give the defendants the benefit of any reasonable doubt?

18. At the conclusion of the trial, the Judge will instruct you as to the law to follow in this matter. Are you prepared to follow the law, even if it leads to a result that is displeasing or distasteful to you?

19. Are you prepared to judge each defendant individually, even though it may lead to a finding that one is guilty and the other is not?

20. Most of the individuals originally charged in the Indictment have pleaded guilty. Some of them are cooperating with the Government and may testify against the defendants who have chosen to go to trial. Do you have any attitudes about criminal defendants or other persons engaged in criminal behavior who decide to cooperate with the government? Describe your attitudes, and whether it would affect the way you view their testimony.

21. This case involves allegations of large scale distribution of marijuana. What is your attitude about illegal drugs in general?

22. What is your attitude about marijuana?

23. Have you ever used marijuana?

24. If so, when was the last time you used it?

25. If you use marijuana, how often do you smoke it?

26. Are you aware that there is a current movement to legalize marijuana and that one or more states have done so? What is your opinion in that regard?

KNOWLEDGE REGARDING THIS MATTER

27. The Government alleges that defendants were involved in a large scale marijuana distribution. Have you heard anything about the case? What have you heard? Have you formed any impressions about the matter from what you knew?

28. Do you know any of the following individuals involved in this matter:

29. Assistant United States Attorney Carl Eurenus?

30. Michael "Mickey" Woods (Defendant)?

31. Albert Millus, Esq., of Hinman, Howard & Kattell, LLP, Binghamton, New York? (Attorney for Mr. Woods).

32. Gaetan Dinelle? (Defendant.)

33. Thomas Ryan? (Attorney for Mr. Dinelle.)

34. Debbie Francis? (Defendant.)

35. Steven Primeau? (Defendant)

36. David Taze Duggan? (Defendant.)

37. Rodney Dingwall? (Defendant.)

38. Mark Smoke? (Defendant – Deceased.)

39. Jonathan Poitras? (Defendant.)

40. Michael Harris? (Defendant.)

41. William Scott Morgan? (Defendant.)

42. Aonwentsiio “Doogie” Sunday? (Defendant.)

43. Mitchell Printup? (Defendant.)

44. Joel Gray Collins? (Defendant – Deceased.)

45. Jeffrey Goulet? (Defendant.)

46. Amanda Stevens? (Defendant.)

47. Noelle Piette? (Defendant.)

48. Bryce Cumming? (Defendant.)

49. Derrick Martin? (Defendant.)

50. Ashley Johnson? (Defendant.)

51. April May Lazore? (Defendant.)

52. Barrett Wagar? (Defendant.)

53. Michelle Daniluck? (Defendant.)
54. Amanda Pond? (Defendant.)
55. Joanna Hyderman? (Defendant.)
56. Martin Foley? (Defendant.)
57. Jeana MacDonald? (Defendant.)
58. Chantal Allaire? (Defendant.)
59. Marc Allaire? (Defendant.)
60. Kayla Snyder? (Defendant.)
61. Cassie O'Byrne? (Defendant.)
62. Kendra Theoret? (Defendant.)
63. Jaque Ryan? (Unindicted Co-Conspirator.)
64. Shawn Ryan? (Unindicted Co-Conspirator⁴.)
65. Aaron Shefler? (Possibly Involved Person.)
66. Portia Simac? (Possibly Involved Person.)
67. Matthew Bell? (Plattsburg, New York Police Officer.)
68. William Bronnor? (New York State Police Investigator.)
69. Robert Burditt? (Inspector, United States Department of Homeland Security,
Customs and Border Protection.)
70. Robert Charles? (Immigration and Customs Enforcement Special Agent.)
71. Terry Combs? (Warren County Sheriff's Deputy.)
72. Joseph Crowley? (Massachusetts State Police Trooper.)
73. Nathan Darienzo? (New York State Police Trooper.)
74. Richard Dumoulin? (New York State Police Investigator.)

75. Donald Fougere? (New York State Police Trooper.)
76. Melissa France? (New York State Police Chemist.)
77. Jovan Germano? (United States Customs and Border Patrol, Patrol Agent.)
78. Richard Hathaway? (New York State Police Investigator.)
79. Todd Kikkert? (Constable, Cornwall, Ontario City Police Department.)
80. Agent (First Name Unknown) Linstad? (Agent, Immigration and Customs Enforcement.)
81. Travis MacDonald? (Patrolman and K-9 Handler, Massena, New York Police Department.)
82. Brendan McBride? (Agent, United States Customs and Border Patrol.)
83. Kevin Merkel? (Special Agent, United States Drug Enforcement Agency.)
84. Timothy Morgan? (Agent and K-9 Handler, United States Customs and Border Patrol.)
85. Kevin Nasworthy? (New York State Police Trooper.)
86. Elisabeth O'Brien? (Assistant Analyst, Massachusetts Department of Public Safety.)
87. Michael O'Donnell? (Officer, Massena, New York Police Department.)
88. Timothy Parent? (New York State Police Trooper.)
89. Raymond Patlik? (Certified Analyst, Health Canada.)
90. James Patterson? (New York State Police Sergeant.)
91. Steven Prenoveneau? (Special Agent, Immigration and Customs Enforcement.)
92. Michael Redmond? (Constable, Ontario Provincial Police.)
93. Andrew Simsa? (Agent, Drug Enforcement Agency.)

94. Richard Stellato? (Criminalist, New Hampshire State Police Forensic Laboratory.)
95. Jay Taylor? (New York State Police Trooper.)
96. Randy Thayer? (Member, New York State Police Narcotics Unit.)
97. Paul Trudeau? (Deputy Sheriff, Jefferson County Sheriff's Office.)
98. Jackalynne Vimislik? (Forensic Scientist, New York State Police.)
99. Cindy Vitale? (Forensic Chemist, Drug Enforcement Agency.)

Dated: Binghamton, New York
July 13, 2015

Respectfully submitted,

/s/ Albert J. Millus, Jr.

HINMAN, HOWARD & KATTELL, LLP
Albert J. Millus, Jr., Esq., of Counsel
Federal Bar Roll No.: 102210
Attorneys for Defendant Michael C. Woods
700 Security Mutual Building
80 Exchange Street
P.O. Box 5250
Binghamton, NY 13902-5250
Telephone: 607-723-5341